

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHELLE E. LATTIMER,

Plaintiff,

v.

HALLMARK HEALTH SYSTEM, INC.,

Defendant.

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) Civil Action No. 05-11072 RAL

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**JOINT MOTION FOR ADDITIONAL TIME TO
COMPLETE FACT DISCOVERY**

Plaintiff Michelle E. Lattimer (“Plaintiff”) and Defendant Hallmark Health System, Inc. (“Hallmark”) (collectively “the parties”) hereby request that the Court extend the time by which the parties may complete fact discovery until June 30, 2006. The parties further request that the Court extend the time by which they may submit dispositive motions up to and including August 31, 2006.

In support of this motion, the parties state that they need additional time to schedule depositions, conduct interviews, and explore possible settlement.

WHEREFORE, Plaintiff Michelle E. Lattimer and Defendant Hallmark Health System, Inc. request that this Court grant their motion to extend the time in which they may complete fact discovery and submit dispositive motions up to and including June 30, 2006, and August 31, 2006, respectively.

Respectfully submitted,

Michelle E. Lattimer

By her attorney

_____/s/ Pamela J. Coveney_____

Pamela J. Coveney, BBO # 107280

Hallmark Health Systems, Inc.

By its attorneys

_____/s/ John Simon_____

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March 29, 2006